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13 *Co-Lead/Liaison Counsel for Plaintiffs*

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products
Liability Litigation,

No. 2:15-MD-02641-DGC

**PLAINTIFFS' CO-LEAD/LIAISON
COUNSELS' MEMORANDUM
REQUESTING SUBSTITUTION OF
LEADERSHIP APPOINTMENTS**

16 In accordance with this Court's Amended Case Management Order No. 1 [Doc.
17 4016], dated November 16, 2016, and the Court's Order of February 17, 2017, Plaintiffs' Co-
18 Lead/Liaison Counsel submit this memorandum requesting the substitution of appointments
19 for Co-Lead/Liaison Counsel and State/Federal Liaison Counsel and Plaintiffs' Leadership
20 Committee ("PLC").

21 In Amended Case Management Order No. 1, this Court appointed Ramon R. Lopez
22 of Lopez McHugh and Robert W. Boatman of Gallagher & Kennedy as Plaintiffs' Co-
23 Lead/Liaison Counsel and State/Federal Liaison Counsel. The Court also appointed 23
24 attorneys from various firms to the Plaintiffs' Steering Committee ("PSC"). The Court also
25 appointed a four-member Plaintiffs' Executive Committee ("PEC") to support Co-Lead
26 Counsel. The Court set these appointments for a one-year term.

27 Plaintiffs' Co-Lead/Liaison Counsel and the PEC hereby respectfully recommend
28 and request that the Court substitute the following appointments:

Substitution of Co-Lead/Liaison Counsel for Gallagher & Kennedy, P.A.

Plaintiffs' Co-Lead Counsel and the Plaintiffs' Executive Committee (PEC) request that Mark S. O'Connor, Gallagher & Kennedy, P.A., be substituted as Plaintiffs' Co-Lead and Local/Liaison Counsel in place of Robert W. Boatman, Gallagher & Kennedy, P.A. Plaintiffs' Co-Lead Counsel, Ramon R. Lopez and Robert W. Boatman, and the PEC support this substitution and request that the Court appoint Mark S. O'Connor, Gallagher & Kennedy, P.A., as Co-Lead and Local/Liaison Counsel.

Mark O'Connor's Application to Serve as Co-Lead and Local/Liaison Counsel is attached as Exhibit A.

Substitution of PSC Appointment.

After the Court's previous appointment of PSC members, Sheila M. Bossier left the firm of Freese & Goss, PLLC. Sheila M. Bossier has requested that the firm of Freese & Goss, PLLC be removed and that she be substituted on the PSC under the firm name of Bossier & Associates PLLC. A copy of Sheila M. Bossier's information and materials supporting her application for substitution appointment is attached as Exhibit B.

Plaintiffs' Co-Lead Counsel and the PEC members support this substitution and request that the Court remove the firm of Freese & Goss, PLLC and appoint Sheila M. Bossier, Bossier & Associates PLLC, to the PSC.

Accordingly, Plaintiffs' Co-Lead/Liaison Counsel and the PSC request that this Court: (1) substitute Mark S. O'Connor of Gallagher & Kennedy, P.A. for Robert W. Boatman of Gallagher & Kennedy, P.A., to serve as Co-Lead and Local/Liaison Counsel; and (2) remove the law firm of Freese & Goss, PLLC and substitute Sheila M. Bossier, Bossier & Associates PLLC, on the PSC.

RESPECTFULLY SUBMITTED this 15th day of March 2017.

LOPEZ McHUGH LLP

By: /s/ Ramon Rossi Lopez
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Co-Lead/Liaison Counsel for Plaintiffs

Certificate of Service

I hereby certify that on this 15th day of March, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Gay Mennuti

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